

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:)	Case No:	16-23397
Lloyd Taylor)		
)	Chapter:	Chapter 13
Debtor)		
)	Judge:	Timothy A. Barnes

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on November 19, 2020 at 2 pm, I will appear before the Honorable Timothy A. Barnes, or any judge sitting in that judge's place, and present the motion of Lloyd Taylor to modify his confirmed Chapter 13 Plan, a copy of which is attached

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is 161 329 5276 and the password is 433658. The meeting ID and password can also be found on the judge's page on the court's website.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By: /s/ Dale Allen Riley

Dale Allen Riley
Geraci Law L.L.C.
55 E. Monroe Street #3400
Chicago, Illinois 60603
312.332.1800
ndil@geracilaw.com

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:)	Case No:	16-23397
Lloyd Taylor)	Chapter:	Chapter 13
Debtor)	Judge:	Timothy A. Barnes

CERTIFICATE OF SERVICE

I, Dale Allen Riley, certify that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on October 29, 2020 at 4:22 PM.

LIST OF PARTIES SERVED

Marilyn O. Marshall, 224 S. Michigan Ave. #800 , Chicago, IL 60604

Office of the U.S. Trustee, 219 S. Dearborn, Suite 873, Chicago, Illinois 60604

Lloyd Davis Taylor, 12535 Elizabeth , Calumet Park, IL 60827

[See attached list]

America S Financial Choice
C/O Accounts Receivable MA
910 W Van Buren Ste 100
Chicago IL 60607

Sprint
C/O Enhanced Recovery CO L
8014 Bayberry Rd
Jacksonville FL 32256

Cash Loans Today

University of Chicago Med Ctr
Bankruptcy Department
15965 Paysphere Circle
Chicago IL 60674

11949 S Pulaski Rd
Alsip IL 60803

City of Blue Island
Bankruptcy Department
13051 Greenwood Ave.
Blue Island IL 60406

Village of Alsip
Attn: Bankruptcy Department
4500 W. 123rd
Alsip IL 60803

Commonwealth Edison
Attn: System Credit/BK Dept
3 Lincoln Center 4th Floor
Oakbrook Terrace IL 60181

Village of Merrionette Park

11720 S Kedzie
Merrionette Park IL 60803

Credit ONE BANK NA
Attn: Bankruptcy Dept.
Po Box 98875
Las Vegas NV 89193

First Premier BANK
Attn: Bankruptcy Dept.
601 S Minnesota Ave
Sioux Falls SD 57104

Foursight Capial

265 E 100 South
Suite 300
Salt Lake City UT 84111

IRS Priority Debt
Bankruptcy Dept.
PO Box 7346
Philadelphia PA 19101

Metrosouth Medical Center
Bankruptcy Department
12935 Gregory St.
Blue Island IL 60406

Regional Acceptance CO
Attn: Bankruptcy Dept.
304 Kellm Road
Virginia Beach VA 23462

Santander Consumer USA
Attn: Bankruptcy Dept.
Po Box 961245
Ft Worth TX 76161

Secretary of State
Attn: Safety & Financial Resp
2701 S. Dirksen Pkwy.
Springfield IL 62723

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re: Lloyd Taylor Debtor)))))	Case No: 16-23397 Chapter: Chapter 13 Judge: Timothy A. Barnes
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MOTION TO MODIFY CONFIRMED PLAN

NOW COMES the Debtor, Mr. Lloyd Taylor (the “Debtor”), by and through his attorneys, Geraci Law L.L.C., to present his **MOTION TO MODIFY CONFIRMED PLAN**, and states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. 1334 and this is a “core proceeding” under 28 U.S.C. 157(b)(2).
2. The Debtor filed his Petition for Relief and plan under Chapter 13 of the U.S. Bankruptcy Act on 07/21/2016.
3. The Debtor’s plan was confirmed by the Court on 9/15/2016.
4. The Debtor was laid off from his prior employer in or around January, 2020. He looked for new work promptly but due to the COVID-19 pandemic he was unable to find new work until recently.
5. He has advised his attorneys of his re-employment and has provided proof of this new income to his attorneys.
6. This income appears lower than his prior level of income but he has authorized his attorneys to resume payroll deductions at the prior level of \$254 per biweekly paycheck.
7. It is not feasible to defer the pending default without the plan lasting longer than 60 total months but because his inability to promptly resume payments to the Chapter 13 Trustee is attributable to the COVID-19 pandemic Section 1329(d) of the bankruptcy code allows for the extension of his plan’s term.

WHEREFORE THE DEBTOR, Mr. Lloyd Taylor, respectfully requests this Honorable Court enter an order:

1. Deferring arrears to the end of the plan term,
2. Extending the Chapter 13 Plan term to 68 months, and
3. For any other relief the court deems proper.

By: /s/ Dale Allen Riley
Dale Allen Riley

Attorneys for the Debtor

Geraci Law L.L.C.

55 E. Monroe Street #3400

Chicago, Illinois 60603

(Ph): 312.332.1800 (Fax): 877.247.1960